

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Competitive Product Prices
International Priority Airmail, Commercial ePacket
Priority Mail Express International, Priority Mail
International & First-Class Package International
Service Contract 2 (MC2020-161)
Negotiated Service Agreements

Docket No. CP2020-184

PUBLIC REPRESENTATIVE COMMENTS ON NOTICE OF
POSTAL SERVICE FILING MODIFICATION TWO TO
INTERNATIONAL PRIORITY AIRMAIL, COMMERCIAL ePACKET,
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL INTERNATIONAL,
& FIRST-CLASS PACKAGE INTERNATIONAL SERVICE CONTRACT 2

(December 20, 2022)

The Public Representative hereby provides comments pursuant to the Commission's Notice in this docket.¹ In that Order, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Notice of Filing of Modification Two to International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International & First-Class Package International Service Contract 2.²

¹ PRC Notice Initiating Docket No. CP2020-184, December 14, 2020

² Notice of the United States Postal Service of Filing Modification Two to International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International & First-Class Package International Service Contract 2, December 13, 2022. (Notice).

The Postal Service's Notice includes a certified statement as required by 39 C.F.R. § 3035.105(c)(2), a public (redacted) version of Modification Two to Contract 2 and supporting financial data estimating the contract value during the first year.

In Order No. 5569, the Commission approved the Postal Service's request to add a new product identified as International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International & First-Class Package International Service Contract 2 to the Competitive Product List.³ The Commission approved Modification One to the Agreement in Order No. 5823.⁴ Modification Two revises Articles 2, 3, 7, 8, 10, 13 and 15 of the Agreement, changes Article 13 so that the Agreement will remain in effect until May 31, 2024, and adds Annexes 1B, 2B, 3B, 4B, 5B and 6B to the Agreement.. *Attachment A, at 1*. The intended effective date of Modification Two is January 22, 2022. *Id.*

COMMENTS

The Public Representative has reviewed the Postal Service's Notice of Modification to International Priority Airmail, Priority Mail Express International, Commercial ePacket, Priority Mail International, First-Class Package International Service Contract 5 and the financial data filed under seal with the Postal Service's Notice. Based upon that review, the Public Representative concludes that Contract 2, as modified, should continue to generate sufficient revenues to cover costs and thereby satisfy 39 U.S.C. § 3633(a) and thus should be approved by the Commission.

³ See Order No. 5569 Order Adding International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International & First-Class Package International Service Contract 2 to the Competitive Product List, Docket Nos. MC2020-161/CP2020-184, June 29, 2020.

⁴ See Docket No. CP2020-177, et. al., Order No. 5823, Order Approving Modification One to International Priority Airmail, Priority Mail Express International, Commercial ePacket, Priority Mail International & First-Class Package International Service Contract 2, January 21, 2021.

Finally, the Postal Service must file revenue and cost data for Contract 2 in future Annual Compliance Reports. This data will permit the Commission to annually review the financial results for Contract 2 for compliance with 39 U.S.C. § 3633(a).

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

Kenneth R. Moeller
Public Representative

901 New York Ave. NW
Washington, DC 20268-0001
202-789-6888
kenneth.moeller@prc.gov